

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FILED JUL 20 2023 Case No. 4:23-MJ-535 CLERK, U.S. DISTRICT COURT By _____ Deputy
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UNITED STATES OF AMERICA

v.

BRIAN DANIEL RAMIREZ (01)
RODNEY LEON DUNN (02)
ROBBY LAYNE DUNN (03)

Case No. 4:23-MJ-535

CRIMINAL COMPLAINT

Alleged Offense:

I, Special Agent Rocky Ductan, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Beginning in or before August 2022 and continuing until in and around June of 2023, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendants, **Brian Daniel Ramirez , Rodney Leon Dunn, and Robby Layne Dunn** along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A), namely to distribute and possess with intent to distribute at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a schedule II controlled substance.

In violation of 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A).

Probable Cause:

I, SA Rocky Ductan, affiant and under oath, duly state that I am a Special Agent with the Drug Enforcement Administration (DEA), assigned to the DEA Task Force, Group 1, Fort Worth District Office (FWDO). The statements set forth in this affidavit are true and correct to the best of my knowledge and belief but are not inclusive of all the evidence or information in this case.

1. In June of 2023, Investigators with the Hood County Sheriff's Office (HCSO) opened an investigation into the suspected drug trafficking activities of **Brian Daniel Ramirez**. During the course of the investigation HCSO Investigators identified a residence associated with **Ramirez** located at XXXX Second Street, Granbury Texas 76048 (Bromley Apartments). On June 1, 2023, HCSO Investigators were in the area of XXXX Second Street, Granbury, Texas in regards to illegal narcotics information received about **Ramirez**. While in the area, HCSO investigators conducted a traffic stop of a 2011 Red Dodge Nitro (TX Reg PDZ9738) for an observed violation. The Dodge Nitro was being operated by **Robby Lanye Dunn** and occupied by his brother **Rodney Leon Dunn**

2. During the traffic stop, **Robby Dunn** and **Rodney Dunn** consented to a search of the vehicle. During the search, HCSO Investigators discovered a duffle bag style bag in the back seat. Investigators opened the bag and discovered approximately 1000 grams of a crystalline substance which was subsequently field tested and indicated a presumptive positive for Methamphetamine. HCSO Investigators also discovered approximately 40 grams of a white powdery substance that was subsequently field tested and indicated a presumptive positive for Cocaine.

3. **Rodney Dunn** and **Robby Dunn** told investigators on scene that **Ramirez** called them earlier in the day and directed them to meet him (**Ramirez**) in the parking lot of the Wings Etc. located at 1507 North Plaza Dr, Granbury, Texas, 76048. During the meet, **Ramirez** gave **Rodney Dunn** an apartment key and directed **Rodney Dunn** to retrieve the duffle bag from XXXX Second Street, Apt XXX, Granbury, Texas 76048 and bring it back to him (**Ramirez**) at his store: La Casa Snack Shop.

Rodney Dunn said on scene that **Ramirez** specified not to look at the contents in the bag.

Rodney Dunn said on scene he was aware that **Ramirez** is a drug dealer.

4. On June 5, 2023, Agents/TFOs from the DEA FWDO conducted the post-Miranda interviews of **Rodney Dunn** and **Robby Dunn**. During the interviews, both **Robby Dunn** and **Rodney Dunn** affirmed that they were aware that **Ramirez** was a drug trafficker. **Robby Dunn** and **Rodney Dunn** stated that they have personally purchased narcotics from **Ramirez** as well as witnessed **Ramirez** conduct the sale of narcotics on numerous occasions. **Rodney Dunn** further emphasized that during the meet with **Ramirez**, **Ramirez** told him (**Rodney Dunn**) that he (**Ramirez**) had been in a fight with his girlfriend. **Ramirez** told **Rodney Dunn** he did not want to go to the apartment for that reason. **Ramirez** told **Rodney Dunn** that his girlfriend was at work and directed him (**Rodney Dunn**) to retrieve his (**Ramirez**) bag in a specific location within the apartment where no other bag but the one described by **Ramirez** was seen and retrieved by **Rodney Dunn**. **Ramirez** further informed **Rodney Dunn** that the contents of the duffle bag were a laptop and clothing.

5. On June 22, 2023, Agents with DEA FWDO conducted a forensic analysis of cellular devices belonging to **Rodney** and **Robby Dunn** pursuant to a consent search.

Below is a recent SMS conversation in April 2023 between **Rodney Dunn (XXX-XXX-9063)** and **Ramirez (XXX-XXX-0443)**

11:38 a.m.: RAMIREZ: "*Watz Up*"

11:41 a.m.: RODNEY: "*Headed to wings. To see Robby and jack for lunch. U hungry.and need 10 blues. Can you come by here.*"

11:43 a.m.: RAMIREZ: "*Yea*"


11:46 a.m.: RODNEY: "*Hey. I gave Jack back 20. Those droes we're 7.5. I charged him 120. I thought they were 10s.. no biggie. Bring 10 droes also. Tks*"

6. Agents/TFOs believe that **Rodney Dunn** and **Ramirez** arranged to meet at Wings where **Ramirez** resupplied **Rodney Dunn** with ten counterfeit fentanyl pills (“blues”). **Rodney Dunn** also informed **Ramirez** of a prior sale that he (**Rodney Dunn**) completed on behalf of the **Ramirez DTO** and proceeded to request ten hydrocodone pills (“droes”).

7. The majority of the approximately 2000 SMS conversations recorded between **Rodney Dunn** and **Ramirez** within their respective cellular devices referenced several illegal narcotic transactions or locations to meet. Further analysis of **Rodney Dunn’s** call log indicated that on June 1, 2023, **Ramirez** and **Rodney Dunn** spoke on the phone seven times between 1:03 p.m. and 2:11 p.m.

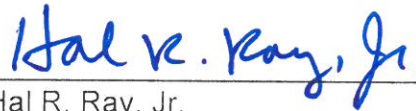
8. Forensic Analysis of video surveillance footage in the Wings Etc. parking lot captured on June 1, 2023, shows **Ramirez** meet with **Robby** and **Rodney Dunn** at approximately 2:08 p.m. **Ramirez** approached **Robby Dunn’s** vehicle where he speaks to **Rodney Dunn**. During the conversation, **Ramirez** is seen pointing in the direction of the Bromley Apartment complex seemingly directing **Robby** and **Rodney Dunn** where to go. On June, 6, 2023, HCSO investigators received a call from **Ramirez** who said he was in Houston, Texas on June 1, 2023, which directly contradicts the surveillance footage.

9. Accordingly, based on the foregoing, there is probable cause to believe that each of the above-named defendants, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to possess with intent to distribute at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine in violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(A) and 841(a)(1) and (b)(1)(A)).



Rocky Dactan, Special Agent
Drug Enforcement Administration

Sworn to before me, and subscribed in my presence on 20th day of July 2023, at 2:10 a.m./p.m. in Fort Worth, Texas.



Hal R. Ray, Jr.

UNITED STATES MAGISTRATE JUDGE